

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

R.E.S.V. and J.A.S.V.,

Plaintiffs,

v.

United States of America,

Defendant.

Civil No. 24-12863

Honorable Susan K. DeClercq
Mag. Judge Curtis Ivy, Jr.

DECLARATION OF ADALBERTO MORALES

Pursuant to 28 U.S.C. § 1746, I, ADALBERTO MORALES, hereby declare as follows:

1. I am a Customs and Border Protection Officer and the Chief of Staff with the Department of Homeland Security, United States Customs and Border Protection (CBP) Office of Federal Operations (OFO) in Eagle Pass, Texas. In this capacity, I am responsible for assisting OFO in the Eagle Pass, Texas region.

2. In my role as Chief of Staff, I have access to CBP systems of record used in the regular course of business and am I familiar with these systems, as I use these systems in my day-to-day activities. The statements made in this Declaration are based on my personal knowledge, information made available to me in the

performance of my official duties, and conclusions and determinations reached and made in accordance therewith.

3. Pursuant to this case, I reviewed records related to the alleged events for the purpose of identifying potential CPB Officer witnesses (i.e., Customs Officers who work at a Port of Entry). I also reviewed our internal communications databases to confirm the current status of these witnesses.

4. My search revealed the following: There are ten CBP Officer witnesses identified on the documents related to Plaintiff's administrative claim. Seven of these individuals are current employees who all reside in Texas based on CBP's information for current employees' locations. The other three individuals are former employees. Two currently still work with the Federal Government—one in Norfolk, Virginia, and one in Austin, Texas. CBP was unable to locate a current address for the other former employee, but his last known duty location was in Eagle Pass, Texas.

5. My search did not find any of these witnesses' residence or employment in Michigan.

6. I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Executed on February 13, 2025

By:  ADALBERTO MORALES
ADALBERTO MORALES
Chief of Staff

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